

BEFORE THE
POSTAL REGULATORY COMMISSION

Periodic Reporting
(UPS Proposals One, Two, and Three)

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: Docket No. RM2016-2
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UNITED PARCEL SERVICE, INC.'S MOTION FOR
EXTENSION OF TIME TO RESPOND TO CHAIRMAN'S
INFORMATION REQUESTS ONE AND THREE

(November 30, 2015)

United Parcel Service, Inc. ("UPS") respectfully submits this Motion for an extension of time to respond to the Chairman's Information Request Nos. 1 and 3.¹ UPS seeks an additional week to respond to Request No. 1, and an additional six days to respond to Request No. 3, such that responses to both requests will be due December 10, 2015.

An extension is needed because the Thanksgiving holiday complicated the extensive collaboration that is required to answer the Commission's seventeen questions to UPS, many of which have multiple sub-parts. UPS submits that prejudice to other parties is unlikely since the January 20, 2016 comment deadline is nearly six weeks after the proposed information request response deadline and over three months since UPS filed its opening petition October 9, 2015.

UPS is authorized to report that the Postal Service takes no position on this motion, other than to request that, if the deadline for UPS to respond to ChIR No. 1 and

¹ Dkt. No. RM2016-2, Chairman's Information Request No. 1 (Nov. 20, 2015) (responses due Dec. 3, 2015); Revised Chairman's Information Request No. 3 (Nov. 24, 2015) (responses due Dec. 4, 2015).

No. 3 were to be extended, then the deadline for the Postal Service to respond to ChIR No. 2 be extended to the same date as well.²

UPS respectfully requests that the Commission grants its Motion.

Respectfully submitted,

UNITED PARCEL SERVICE, INC.,

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² UPS also contacted Amazon to request its position on UPS's request. Amazon stated that it consents to a one-week extension of the due date for UPS's responses to the information requests if the subsequent filing deadlines in the case are also extended by the same amount.